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Plaintiffs Co-Lead Counsel

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-03047-YGR

This Document Relates to:

ALL ACTIONS

**DECLARATION OF LEXI J. HAZAM IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION PURSUANT
TO CIVIL LOCAL RULE 7-11 FOR
BELLWETHER USER DATA AND
ACCOUNT INFORMATION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

I, Lexi J. Hazam, declare and state as follows:

1. I am a partner at Lieff Cabraser Heimann & Bernstein, LLP, and Plaintiffs' Co-Lead Counsel.
2. I submit this declaration, as required by Civil Local Rule 7-11, in support of Plaintiffs' Administrative Motion Pursuant to Civil Local Rule 7-11 for Bellwether User Data and Account Information.
3. Pursuant to Civil Local Rule 7-11(a), on May 8, 2024, the Parties have conferred regarding Plaintiffs' request for Defendants to promptly provide Defendant Fact Sheet data and account preservation captures of Personal Injury Bellwether Plaintiffs social media accounts, as

1 stipulated to and as the parties anticipate Judge Kuhl will order in the Judicial Council
2 Coordination Proceedings.

3 4. The Parties have not reached a stipulation pursuant to Civil Local Rule 7-11(a).
4 Defendants have opposed Plaintiffs' request and Plaintiffs expect Defendants will file an
5 opposition pursuant to Civil Local Rule 7-11(b).

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Executed on May 14, 2024, in San Francisco, California.

8
9 /s/ Lexi J. Hazam
LEXI J. HAZAM